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February 29, 2000

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
7 3 06 PM '00

Lawrence Noble
Office of the General Counsel
Federal Election Commission
999 E. Street, N.W.
Washington, DC 20463

Dear Mr. Noble:

This complaint presents violations of the Federal Election Campaign Act of 1971, as amended ("The Act"), by Michael J. Rogers; the Rogers for Congress Committee ("the Campaign"); Teresa Ann Reid; Jerry Spitlee; Scott Spitlee; and Todd Spitlee.

Rogers is a Republican candidate to represent Michigan's Eighth Congressional District in the United States House of Representatives. Rogers for Congress is his principal campaign committee. Ms. Reid is the campaign's treasurer.

Rogers' most recent FEC report shows that he has committed several serious violations - and may have committed others as well.

Receipt of Illegal Corporate Contributions

The Year End Report shows that the Rogers campaign received illegal in-kind contributions from corporations. The report shows in-kind contributions from five entities: Premier Technologies in Newark, New Jersey; La Prima in Washington, DC; the City Club of Washington in Washington, DC; Marion Oaks Golf Club in Howell, Michigan; and Lake Pointe Manor in Howell, Michigan. (See attachment)

3064 663 40 72

If any of the above entities are incorporated, then Rogers has received an illegal contribution. See 2 U.S.C. 441b. That each one is incorporated is suggested by attached documents and by the campaign's failure to report the contributions as partnership contributions or as individual contributions received through a sole proprietorship account.

Receipt of Excessive Contributions

The Year End Report shows that Rogers blatantly violated the \$1,000 limit. It discloses that Jerry Spitlee and Scott Spitlee each made in-kind contributions of \$2,000 during the primary election, and that Todd Spitlee made in-kind contributions totally \$1,742.16 during that same election. (See attachment) Federal law allows individuals to give only \$1,000.00 per election to a candidate for Congress. 2 U.S.C. 441a(a)(1).

The campaign claims that the excessive portions of these contributions were designated for the general election. However, this cannot be the case. When a candidate receives a contribution for the general election, he must segregate those funds and may not spend them until he has won the nomination. See 11 C.F.R. 102.9(e). As a result, the Commission has made it clear that candidates normally may not accept in-kind contributions for the general election until after the primary.¹

All of the Spitlee contributions are plainly excessive. The campaign never should have accepted the excessive portions in the first place - and in fact should have refunded them long ago. See 11 C.F.R. 103.3(b)(3).

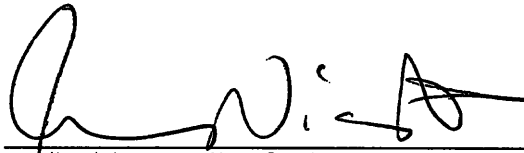
¹While the Commission created a special exception from this rule for the donation of computer equipment to be used in both elections, it clearly stated that this exception did not apply to donations of food, beverages and other items needed during one election. See Advisory Opinion 1996-29.

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Conclusion

The above violations go to the heart of Federal election law and the integrity of the electoral process. Accordingly, we ask that the Commission seek the highest civil penalties allowed by law. Moreover, because Rogers can be expected to commit similar violations until the general election, we ask that the Commission act promptly on this complaint and seek an injunction against future violations.

THE FOREGOING STATEMENTS ARE TRUE
TO THE BEST OF MY KNOWLEDGE
INFORMATION AND BELIEF.



ANDREW NICKELHOFF

Subscribed and sworn to before
me this 29th day of February, 2000



Ruby McQueen, Notary Public
Wayne County, Michigan
My Comm. Expires: 2/13/02

Dated: February 29, 2000

AN/rdm

O:\General\Nickelhoff\MI Democratic Party.Noble ltr.wpd

21-04-399-490

News from

THE MICHIGAN DEMOCRATIC PARTY

00-035

FOR IMMEDIATE RELEASE

Wednesday, March 1, 2000

CONTACT: Dennis Denno
(517) 371-5410

ROGERS' CAMPAIGN BREAKS CAMPAIGN LAW

Rogers Illegally Accepts Corporate Contributions, Excessive Donations

LANSING—In his attempt to raise money for his Congressional campaign, State Senator Mike Rogers (R-Brighton) broke numerous campaign laws. Those violations include accepting illegal money from corporations and accepting contributions that exceeded legal limits. The Michigan Democratic Party (MDP) will file a complaint today with the Federal Election Commission (FEC) over Rogers' illegal activities.

"Rogers' report is riddled with improper actions and illegal money," said Mark Brewer, Chair of the MDP. "For a former law enforcement official to be breaking the law in such a flagrant way is disturbing, at best."

The complaint shows that the Rogers for Congress committee accepted numerous in-kind contributions from corporations over the final six months of 1999. Totaling thousands of dollars, there were contributions from:

- Lake Pointe Manor in Howell, Michigan--\$5,742.16.
- The City Club of Washington in Washington, DC--\$450.45;
- Marion Oaks Golf Club in Howell, Michigan--\$294;
- La Prima of Washington, DC--\$140.25; and
- Premier Technologies of Newark, New Jersey--\$43.22.

Also detailed in the complaint were a number of contributions that exceeded legal limits, which is also against the law. Rogers' year-end report shows nearly \$3,000 in contributions that exceed the legal limit. Despite the fact that those contributions were illegal, the campaign never made an attempt to refund the excessive portions.

"Rogers has repeatedly broken election laws in his campaign, even going to far as to take direct corporate contributions," Brewer said. "Actions like these from Rogers will just give working families one more reason to be distrustful of him in November."

Check Out the MDP on the Web: www.mi-democrats.com

21-04-399-4908

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 6 OF 7
FOR LINE NUMBER

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Rogers for Congress

C 00343863

A. Full Name, Mailing Address and ZIP Code Bruce Maguire Jr. 1350 E. Lake Lansing East Lansing MI 48823	Purpose of Disbursement fundraising expenses Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	Date (month, day, year) 10/14/99	Amount of Each Disbursement This Period 339.03 in-kind
B. Full Name, Mailing Address and ZIP Code Bruce Maguire 1350 E. Lake Lansing East Lansing MI 48823	Purpose of Disbursement fundraising expenses Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	Date (month, day, year) 10/14/99	Amount of Each Disbursement This Period 339.03 in-kind
C. Full Name, Mailing Address and ZIP Code Bruce Maguire 1350 E. Lake Lansing East Lansing MI 48823	Purpose of Disbursement fundraising expenses Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	Date (month, day, year) 10/14/99	Amount of Each Disbursement This Period 339.03 in-kind
D. Full Name, Mailing Address and ZIP Code Amara Premiere Technologies P.O. Box 14034 Newark, NJ 07198	Purpose of Disbursement Broadcast fax Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	Date (month, day, year) 10/15/99 12/14/99 12/14/99	Amount of Each Disbursement This Period 18.12 15.15 14.95 in-kind
E. Full Name, Mailing Address and ZIP Code La Prima 1050 Connecticut Ave Washington, DC 20036	Purpose of Disbursement catering Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	Date (month, day, year) 10/27/99	Amount of Each Disbursement This Period 140.25 in-kind
F. Full Name, Mailing Address and ZIP Code The City Club of Washington 565 15th St. NW Washington DC 20001	Purpose of Disbursement Catering Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	Date (month, day, year) 12/11/99 12/14/99	Amount of Each Disbursement This Period 250.00 200.45 in-kind
G. Full Name, Mailing Address and ZIP Code American Insurance Association 1130 Connecticut Washington, DC 20036	Purpose of Disbursement room rental Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	Date (month, day, year) 10/27/99	Amount of Each Disbursement This Period 100.00 in-kind
H. Full Name, Mailing Address and ZIP Code NRCC 330 First St. SE Washington DC 20003	Purpose of Disbursement Satellite Feed Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	Date (month, day, year) 9/1/99 9/30/99	Amount of Each Disbursement This Period 98.00 98.00 in-kind
I. Full Name, Mailing Address and ZIP Code Peter Paisley 42705 Grand River Novi, MI 48375	Purpose of Disbursement Catering Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	Date (month, day, year) 11/1/99	Amount of Each Disbursement This Period 132.30 in-kind

SUBTOTAL of Disbursements This Page (optional)

2643.18

TOTAL This Period (last page this line number only)

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 7 OF 7
FOR LINE NUMBER

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NAME OF COMMITTEE (In Full)

Rogers for Congress

C00343863

A. Full Name, Mailing Address and ZIP Code Marion Oaks Golf Club 3650 D-19 Howell, MI 48845	Purpose of Disbursement Catering Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 7/26/99	Amount of Each Disbursement This Period (un-kind) 294.00
B. Full Name, Mailing Address and ZIP Code Duke Pointe Manor Island River Howell, MI 48843	Purpose of Disbursement Catering Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 11/13/99	Amount of Each Disbursement This Period 5742.16 un-kind
C. Full Name, Mailing Address and ZIP Code Gary Reed 1645 S. Blvd. Ridge Lansing MI 48915	Purpose of Disbursement Telemarketing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 7/17/99	Amount of Each Disbursement This Period 1000.40 un-kind
D. Full Name, Mailing Address and ZIP Code Terri Olson 4444 Oak Pointe Dr Brighton, MI 48116	Purpose of Disbursement Catering & Parking Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 12/3/99	Amount of Each Disbursement This Period 879.13 un-kind
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

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TOTAL This Period (last page this line number only)

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